

MISSOURI GAMING COMMISSION
MINIMUM INTERNAL CONTROL STANDARDS
SECTION H - CASINO CASHIERING

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Note: Sections 313.800 through 313.850, RSMo., et seq., and Title 11, Division 45 of the Code of State Regulations establish standards to which Class A licensees must comply. Class A licensees should review these statutes and rules to ensure their ICS includes compliance with the requirements set forth. Found Money was moved to Chapter A of the MICS on January 30, 2004, (this was the only change).

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(11 CSR 45-8)

General

1. Casino cashiering procedures for table fills and credits, are included in Section D of the MICS.
2. Casino cashiering procedures for EGD hopper fills and hand-paid jackpot payouts, are included in Section E of the MICS.
3. The procedure for the acceptance of drops for casino cashiering are included in Section G of the MICS.
4. Employees shall not be permitted to carry a pocketbook or other personal container into the cage area unless such container is transparent.

Location and Functions

5. The ICS shall include a description of the locations, functions, and controls of all casino cashiering areas (casino cages, main bank/vault, token storage areas, etc.) including physical characteristics (panic alarms, physical access, cage counter barriers, location of cameras, door peephole, clear plastic trash bags, and other equipment utilized) and key control/access logs. Under no circumstances will change carts be utilized outside of the gaming area which is accessible to the public. All casino cashiering areas to be located outside the casino floor must have the approval of the Director.
6. The functions shall include a description of the various types of transactions performed by each casino cashiering area.

Casino Cage Accountability (11 CSR 45-8.080)

7. The assets for which the cashiers are responsible shall be maintained on an imprest basis, except the main bank, and protected from unauthorized access.
8. At the end of each shift, the outgoing cashiers shall record on a cashier's count sheet the total of the inventory items counted, the total of the opening and closing cashier's inventories, and shall reconcile the opening inventory to the closing inventory.
9. Overages and shortages per employee shall be documented and shall be investigated, and if a variance of greater than \$1,000 or more the MGC duty officer shall be informed:
 - a. immediately upon recognition of a shortage of funds maintained on an imprest basis; or
 - b. at the end of the subsequent gaming day for all other instances.

Note: Sections 313.800 through 313.850, RSMo., et seq., and Title 11, Division 45 of the Code of State Regulations establish standards to which Class A licensees must comply. Class A licensees should review these statutes and rules to ensure their ICS includes compliance with the requirements set forth. Found Money was moved to Chapter A of the MICS on January 30, 2004, (this was the only change).

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10. Both the outgoing and incoming cashier shall sign the completed cashier's count sheet attesting to the accuracy of the information. If there is no incoming cashier, the countdown, verification, and signatory requirements shall be performed by a main bank cashier, cage supervisor or a higher level cage employee.
11. Either the main bank/vault or the casino cage shall account for the token and change bank funds which are maintained on an imprest basis.
12. All paperwork shall be totaled, signed, dated, and include the shift and location (boat, barge, window, deck, etc.).
13. All net changes in outstanding casino receivables are summarized on a casino cage accountability form on a per shift basis.
14. The cashier count sheets shall be forwarded to the main bank/vault at the end of each shift during which activity took place or at least once a day.
15. Corrections on cage accountability, imprest banks, and documentation are made by crossing out the error, entering the correct figure, and then obtaining the initials of the employee making the correction, and the initials of the employee's supervisor. If the corrections are made by the accounting department after the completion and transfer of the documentation, the correction(s) should be initialed by the individual making the correction in accounting.

Main Bank/Vault Accountability

16. All transactions that flow through the casino cage shall be summarized on a main bank/vault accountability form on a per shift basis.
17. Increases and decreases to the main bank/vault inventory are supported by documentation.
18. Either the main bank/vault or the casino cage shall account for the token and change bank funds which are maintained on an imprest basis.
19. At the end of each shift, the outgoing cashiers shall record on a cashier's count sheet the total of the inventory items counted, the total of the opening and closing cashier's inventories, and shall reconcile the opening inventory to the closing inventory.
20. Both the outgoing and incoming cashier shall sign the completed cashier's count sheet attesting to the accuracy of the information. If there is no incoming cashier, the countdown, verification, and signatory requirements shall be performed by a cage supervisor or above.

Note: Sections 313.800 through 313.850, RSMo., et seq., and Title 11, Division 45 of the Code of State Regulations establish standards to which Class A licensees must comply. Class A licensees should review these statutes and rules to ensure their ICS includes compliance with the requirements set forth. Found Money was moved to Chapter A of the MICS on January 30, 2004, (this was the only change).

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21. Copies of the main bank/vault accountability form and cashier count sheets and related documentation shall be forwarded to the accounting department and posted at least monthly.
22. Corrections on cage accountability, imprest banks, and documentation are made by crossing out the error, entering the correct figure, and then obtaining the initials of the employee's supervisor making the correction, and the initials of a supervisor. If the corrections are made by the accounting department after the completion and transfer of the documentation, the correction(s) should be initialed by the individual making the correction in accounting.

Even Exchanges

23. Procedures shall be established for an even exchange of funds between two casino cashiering areas or between a casino cashiering area and token and change banks which include the following:
 - a. The designation of those employees who may process even exchange transactions;
 - b. type of items exchanged;
 - c. the sequence of the required signatures and the distribution of each part of at least a two-part even exchange form; and
 - d. these exchanges shall be performed or escorted by a security officer.

Chip and Token Inventories (11 CSR 45-5.140; -5.150; -5.160; -5.170; -8.040)

24. Procedures shall be established for the receipt, inventory, storage, and destruction of gaming chips and tokens.
25. The MGC boat supervisor/agent shall be notified prior to the delivery, the time, date, and location of delivery of any gaming chips, tokens, and currency.
26. At least two (2) employees from separate departments shall open and check the chips or tokens received. Identify the departments involved in this process.
27. Any deviation between the invoice/packing slip amount or denomination and the actual chips or tokens received or any defects found in such chips or tokens shall be promptly reported to the Director and MGC boat supervisor.
28. Chip and token inventory ledgers shall be maintained by accounting to record, by denomination, the receipt, disbursement, and destruction of primary, secondary and

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reserve gaming chips and tokens. Signature requirements attesting to the accuracy of the information recorded in the ledgers shall be included in the procedures.

29. Identify the storage areas for the primary, secondary and reserve gaming chips and tokens including measures used to secure the gaming chips and tokens and the individuals with access. Primary, secondary and reserve chips shall not be commingled.
30. Chips shall be removed from or returned to the secondary and reserve inventory in the presence of at least two (2) employees. Identify the employees involved in this process.
31. Inventories of primary and secondary sets of chips shall be made on a monthly basis and the results of such inventories shall be recorded in the chip inventory ledger. Physical inventories of secondary/reserve chips may be performed annually if the inventory procedures incorporate the sealing of locked compartments. Include procedures for sealing and accessing these locked compartments. Inventories shall be made in the presence of MGC personnel.
32. During non-gaming hours all chips shall be stored and locked within their appropriate storage cabinets in the locked casino cages, main bank/vault or in locked table trays at the gaming tables.
33. Prior to the destruction of chips and tokens, the Class A Licensee shall notify the Director and MGC boat supervisor in writing of the date and location at which the destruction will be performed, the denomination, numbers, amount of chips and tokens, and the description and number of non-value chips to be destroyed, with an explanation of the method of destruction.
34. The destruction of chips and tokens shall be performed in the presence of at least two (2) individuals, one of whom shall be an agent of the MGC, unless otherwise authorized by the Director.
35. Include procedures for the removal and destruction of damaged chips/tokens from the casino inventory.

Customer Deposits

36. There is one type of customer deposit:
 - a. Safekeeping Deposit - Accepted from customers for the purpose of keeping their money on deposit for withdrawal at a later time.
37. Procedures concerning the withdrawal of deposits shall be established for the verification of the patron's identity including the checking of government-issued photo identification containing a photo (such as a driver's license, state ID card, or passport). The photo

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requirement shall be waived on identification issued by jurisdictions not requiring a photo.

38. A file for patrons shall be prepared prior to acceptance of a deposit. Safekeeping deposits/withdrawals shall only be performed at the main casino cage.
39. The receipt or withdrawal of a customer deposit shall be evidenced by at least a two-part form with one part going to the patron and one part remaining in the casino cage file. Include procedures for the distribution of the various parts of the customer receipt or withdrawal form and any voided forms.
 - a. The multi-part form shall contain the following information:
 - 1) same preprinted number on all copies;
 - 2) customer's name and signature;
 - 3) date of receipt and disbursement;
 - 4) dollar amount of deposit;
 - 5) type of deposit (check, chips, tokens, jackpot receipts if proper tax forms are completed); and
 - 6) reason for deposit (lack of proper ID, unclaimed jackpot, etc.).
 - b. Procedures are established to:
 - 1) maintain a detailed record by patron name and date of all funds on deposit;
 - 2) maintain a current balance of all customer deposits which are in the cage/vault inventory or accountability;
 - 3) reconcile this current balance with the deposits and withdrawals at least daily; and
 - 4) if no picture ID is available, obtain surveillance photo of person making the deposit/withdrawal at the time of the deposit/withdrawal.
40. Describe the sequence of the required signatures attesting to the accuracy of the information contained on the customer deposit or withdrawal form ensuring that the form is signed by the cashier and cage supervisor.
41. All customer deposit and withdrawal transactions at the casino cage are recorded on a casino cage accountability form on a per-shift basis.
42. The MGC Audit Manager and the boat supervisor will be notified in writing by the licensee for those deposits left with the licensee for more than thirty (30) days.

Check Cashing Privileges

Note: Sections 313.800 through 313.850, RSMo., et seq., and Title 11, Division 45 of the Code of State Regulations establish standards to which Class A licensees must comply. Class A licensees should review these statutes and rules to ensure their ICS includes compliance with the requirements set forth. Found Money was moved to Chapter A of the MICS on January 30, 2004, (this was the only change).

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43. Policies and procedures shall be established for the authorization and issuance of check cashing privileges. These procedures should include the approval process for establishing these privileges.
44. Only the following checks may be cashed at a casino cage with government-issued photo identification:
- a. personal checks, including DBA checks as long as the party presenting the check is named on the check;
 - b. cashier's checks;
 - c. money orders;
 - d. credit card advance checks;
 - e. traveler's checks; and
 - f. wire transfer service checks; and
 - g. in-house casino or company-wide issued checks which may only be redeemed for cash, and/or chips or tokens providing the \$500 loss limit is not violated.

If personal checks are cashed, the cashier:

- a. Examines the patron's picture identification (i.e., driver's license or other government-issued identification);
 - b. records a drivers license number;
 - c. immediately stamps the personal check "for deposit only";
 - d. time and date stamps the personal check;
 - e. initials the personal check; and
 - f. counts out in full public view the funds requested by the patron.
45. No third-party checks may be cashed. For purposes of this section, a payroll check is considered a third-party check.
46. The failure to deposit for collection a negotiable instrument by the next banking day following receipt shall be considered an extension of credit.
47. No buy-back of checks shall be allowed. Payment of an insufficient funds check shall not be considered a buy-back.

Returned Checks

48. All returned checks which are the responsibility of the licensee shall be documented on a returned check log by a department independent of the casino cage/credit departments.
49. Procedures shall be established for collecting and recording checks returned to the Class A Licensee after deposit which include re-deposit procedures.

Note: Sections 313.800 through 313.850, RSMo., et seq., and Title 11, Division 45 of the Code of State Regulations establish standards to which Class A licensees must comply. Class A licensees should review these statutes and rules to ensure their ICS includes compliance with the requirements set forth. Found Money was moved to Chapter A of the MICS on January 30, 2004, (this was the only change).

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50. A continuous record of all returned checks which are the responsibility of the licensee shall be maintained. The records shall contain the following information:
- a. Original date of the check;
 - b. name and address of the drawer of the check;
 - c. amount of the check;
 - d. check number;
 - e. date the check was dishonored; and
 - f. date(s) and amount(s) of any collections received on the check after being returned by a bank.
51. Licensees who contract with outside commercial check guarantee services shall include in that contract the requirement that a return check log shall be provided to MGC upon request. The log shall contain the amount, name of patron and date of each check.
52. Procedures shall be described for notification of casino cage/credit departments of returned checks and the prohibition from granting further privileges to patrons whose checks have been returned and remain unsatisfied.

Other Cash Transactions

53. Procedures shall be established for foreign currency acceptance, etc.
54. Currency exchanges are limited to exchanges no greater than \$500.

Exchange and Storage of Foreign Tokens (11 CSR 45-5.130)

55. Foreign tokens inadvertently received in EGD drops shall be recorded as drop for tax remittal Adjusted Gross Receipt purposes.
56. Foreign tokens shall be separated from the Class A Licensee's tokens and stored in a locked compartment in the main bank/vault. Describe procedures for the storage and accountability concerning foreign tokens.
57. Foreign tokens exchanged with other gambling riverboats shall be transported to or from the appropriate casino by an employee of either casino independent of the transaction.
58. Foreign tokens shall only be exchanged for an equal value of the Class A Licensee's tokens, check or cash.
59. The Class A Licensee shall receive a signed receipt for the foreign tokens exchanged.

Exchange and Storage of Foreign Chips (11 CSR 45-5.130)

Note: Sections 313.800 through 313.850, RSMo., et seq., and Title 11, Division 45 of the Code of State Regulations establish standards to which Class A licensees must comply. Class A licensees should review these statutes and rules to ensure their ICS includes compliance with the requirements set forth. Found Money was moved to Chapter A of the MICS on January 30, 2004, (this was the only change).

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- 60. Foreign chips shall be separated from the Class A Licensee's chips and stored in a locked compartment in the main bank/vault. Describe procedures for the storage and accountability concerning foreign chips.
- 61. Foreign chips exchanged with other gambling riverboats shall be transported to the appropriate casino by an employee independent of the transaction.
- 62. Foreign chips shall only be exchanged for an equal value of the Class A Licensee's chips, check or cash.
- 63. The Class A Licensee shall receive a signed receipt for the foreign chips exchanged.

Coupon Redemption and Other Complimentary Distribution Programs (11 CSR 45-5.180)

- 64. Any program for exchanges of coupons for chips and/or tokens or other coupon program shall be approved by the Director or his designee prior to implementation; if approved, detailed procedures shall be established to account for and control such programs as follows:
 - a. records shall be maintained for the inventory on hand including the disbursement and redemption of the coupons;
 - b. net effect, if any, on adjusted gross receipts including records utilized to determine the effect;
 - c. for coupons issued regarding a promotion for EGDs or table games, promotional chips and tokens shall be submitted for review and approval pursuant to the Code of State Regulations (11 CSR 45-5.180); and
 - d. describe procedures for canceling all coupons upon receipt at the cage or at slot booth outlets and change carts. However, promotional coupons cannot be redeemed by table games personnel.
- 65. Only match play coupons shall be accepted at gaming tables. Token and chip buy-in coupons may only be exchanged at a cage, slot booth outlet or change cart.
 - a. The amount of currency tendered by the patron shall be the amount debited from their ALLTS/scrip.

Inspection of Mechanical Token Counting Devices

- 66. Machines shall be inspected for loose tokens daily.
- 67. At a minimum, the mechanical token counting devices shall be cleaned weekly.

Note: Sections 313.800 through 313.850, RSMo., et seq., and Title 11, Division 45 of the Code of State Regulations establish standards to which Class A licensees must comply. Class A licensees should review these statutes and rules to ensure their ICS includes compliance with the requirements set forth. Found Money was moved to Chapter A of the MICS on January 30, 2004, (this was the only change).

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68. At a minimum on a weekly basis, each machine shall be tested with a predetermined amount of each denomination of tokens used. Documentation of the cleaning and testing shall be maintained in the cage.

Note: Sections 313.800 through 313.850, RSMo., et seq., and Title 11, Division 45 of the Code of State Regulations establish standards to which Class A licensees must comply. Class A licensees should review these statutes and rules to ensure their ICS includes compliance with the requirements set forth. Found Money was moved to Chapter A of the MICS on January 30, 2004, (this was the only change).